

**LEVIN-EPSTEIN & ASSOCIATES, P.C.**

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60 East 42<sup>nd</sup> Street • Suite 4700 • New York, New York 10165  
T: 212.792.0048 • E: [Jason@levinepstein.com](mailto:Jason@levinepstein.com)

August 27, 2024

**Via Electronic Filing**

The Hon. John P. Cronan, U.S.D.J.  
U.S. District Court, Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

Re: *Apkaki v. Proguard Protection Inc. et al*  
Case No.: 1:24-cv-02687-JPC

Dear Honorable Judge Cronan:

This law firm represents Plaintiff Frederick Apkaki (the “Plaintiff”) in the above-referenced matter. This letter is submitted jointly with counsel for Defendants Proguard Protection Inc., Robert Hall, and Richard Stanley (collectively, the “Defendants”).

Pursuant to Your Honor’s Individual Motion Practice Rules, and the directives in Your Honor’s August 23, 2023 Memo Endorsement [Dckt. No. 14], this letter respectfully serves to provide the Court with a status update.

The parties are pleased to report that they have reached a settlement in the above-referenced action.

The instant letter further respectfully serves to request a short extension of time for the parties to file the motion for settlement approval pursuant to *Cheeks v. Freeport Pancake House*, 796 F. 3d 199 (2d Cir. 2015) from September 6, 2024 to, through and including September 20, 2024. This is the first request of its kind. If granted, this request would not affect any other Court-scheduled deadlines.

The basis of this request is that the undersigned is currently traveling overseas, and will have limited availability until September 5, 2024.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

Jason Mizrahi, Esq.  
60 East 42<sup>nd</sup> Street, Suite 4700  
New York, New York 10165  
Tel. No.: (212) 792-0048  
Email: [Jason@levinepstein.com](mailto:Jason@levinepstein.com)  
*Attorneys for Plaintiff*

VIA ECF: All Counsel

The instant request is granted. The deadline for the parties to file the motion for settlement approval is hereby extended to September 20, 2024. The Clerk of Court is respectfully directed to close Docket Number 15.

SO ORDERED.

Date: August 28, 2024  
New York, New York

A handwritten signature in black ink, appearing to read "John P. Cronan", is positioned above a horizontal line.

JOHN P. CRONAN  
United States District Judge